



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 1, 2020

**By ECF and Email**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

10/2/2020

The government may submit their  
proposed forfeiture order by October 8,  
2020. SO ORDERED.

**Re: *United States v. Ragonese*, 19 Cr. 154 (PAC)**

Dear Judge Crotty:

The Government respectfully submits this letter to request, with the consent of defense counsel, that the Court extend the deadline for the Government to submit a proposed order of forfeiture as to specific property ("Proposed Forfeiture Order") to October 8, 2020. Yesterday, September 30, 2020, the Court sentenced Ryan Ragonese, the defendant, and requested the Government submit by the end of today (October 1, 2020) for the Court's consideration a Proposed Forfeiture Order. Earlier today, the Government prepared and shared with defense counsel such an order, which the Government anticipates will be agreed and consented to by all parties.

Because the defendant is in custody and because of current COVID-19-related restrictions on attorney-client contact for incarcerated defendants, defense counsel does not anticipate being able to speak with the defendant and seek his consent to the Proposed Forfeiture Order until early next week. Accordingly, to facilitate defense counsel's ability to seek the defendant's consent to the Proposed Forfeiture Order, the Government respectfully requests its deadline to present that order to the Court be extended to October 8, 2020. This is the first request for such an extension by the Government.

Respectfully Submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/

\_\_\_\_\_  
Daniel H. Wolf  
Assistant United States Attorney  
(212) 637-2337

cc: Ariel Werner, Esq. (by ECF)  
Annalisa Miron, Esq. (by ECF)